

# EXHIBIT 20

Morgan, Patricia Kay

August 27, 2007

Tampa, FL

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IN THE CIRCUIT COURT OF  
MONTGOMERY COUNTY, ALABAMA

- - - - -x  
STATE OF ALABAMA, :  
Plaintiff, :  
vs. : Case No.: CV-05-219  
ABBOTT LABORATORIES, INC., : Judge Charles Price  
et al. :  
Defendants. :

- - - - -x  
UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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In re: PHARMACEUTICAL :  
INDUSTRY AVERAGE WHOLESALE : MDL No. 1456  
PRICE LITIGATION : Civil Action No.  
: 01-12257-PBS  
THIS DOCUMENT RELATES TO: :  
:  
ALL ACTIONS :

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DEPOSITION OF PATRICIA KAY MORGAN  
August 27, 2007

Henderson Legal Services  
202-220-4158

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<p style="text-align: right;">Page 26</p> <p>1 EXAMINATION</p> <p>2 BY MR. EDWARDS:</p> <p>3 Q. By my watch it's around 1:15. Thank you</p> <p>4 for appearing today, Ms. Morgan. I'm Steve</p> <p>5 Edwards. I represent Bristol-Myers Squibb in the</p> <p>6 case by the State of Alabama against a number of</p> <p>7 pharmaceutical manufacturers and many other cases</p> <p>8 as to which your deposition has been noticed here</p> <p>9 today.</p> <p>10 Why don't we start by asking you to state your</p> <p>11 name and address for the record.</p> <p>12 A. Patricia Kay Morgan, 700 South Harbour</p> <p>13 Island Boulevard, Tampa, Florida 33602.</p> <p>14 Q. And is it correct that you're here today</p> <p>15 pursuant to a subpoena?</p> <p>16 A. That's correct.</p> <p>17 Q. And is it also correct that you objected</p> <p>18 to the subpoena?</p> <p>19 A. That's correct.</p> <p>20 Q. So you're not here today voluntarily;</p> <p>21 you're here because a court ordered you to appear,</p> <p>22 correct?</p> <p>23 A. That's correct.</p>	<p style="text-align: right;">Page 28</p> <p>1 Q. First DataBank, as I understand it, is a</p> <p>2 company that reports product and pricing</p> <p>3 information on pharmaceutical products; is that</p> <p>4 correct?</p> <p>5 A. That's correct.</p> <p>6 Q. Okay. And First DataBank is owned by</p> <p>7 Hearst Corporation, is that correct?</p> <p>8 A. That's correct.</p> <p>9 Q. And Hearst Corporation is a public</p> <p>10 company; it's not owned by any of the</p> <p>11 pharmaceutical manufacturers? Is that true?</p> <p>12 A. I don't believe it's a public company.</p> <p>13 Q. Okay. But it's not owned by any</p> <p>14 pharmaceutical manufacturers; is that true?</p> <p>15 A. That's true.</p> <p>16 Q. It's independent of the pharmaceutical</p> <p>17 manufacturers; is that fair?</p> <p>18 A. That's true.</p> <p>19 Q. Now, as I understand it, at First</p> <p>20 DataBank you were the manager of editorial</p> <p>21 services?</p> <p>22 A. That's correct.</p> <p>23 Q. And as such, you were responsible for</p>
<p style="text-align: right;">Page 27</p> <p>1 Q. And you're represented by counsel here</p> <p>2 today; is that correct?</p> <p>3 A. That's correct.</p> <p>4 Q. And that's Mr. Kern?</p> <p>5 A. Correct.</p> <p>6 Q. And he is also counsel for First</p> <p>7 DataBank; is that your understanding?</p> <p>8 A. That's correct.</p> <p>9 Q. And First DataBank is your former</p> <p>10 employer; is that correct?</p> <p>11 A. That's correct.</p> <p>12 Q. As I understand it, you graduated from</p> <p>13 college in about 1975; is that correct?</p> <p>14 A. That's correct.</p> <p>15 Q. And you have a pharmacy degree?</p> <p>16 A. That's correct.</p> <p>17 Q. And then after college you worked at</p> <p>18 Abbott Labs from 1975 to sometime in 1999; is that</p> <p>19 correct?</p> <p>20 A. That's correct.</p> <p>21 Q. And then you worked at First DataBank</p> <p>22 from 1999 till sometime in 2005?</p> <p>23 A. That's correct.</p>	<p style="text-align: right;">Page 29</p> <p>1 populating the drug database; is that correct?</p> <p>2 A. As far as the product and the pricing</p> <p>3 information.</p> <p>4 Q. And the pricing information that appeared</p> <p>5 in that database included average wholesale prices</p> <p>6 or AWP's; correct?</p> <p>7 A. We called it Blue Book AWP. But yes,</p> <p>8 there was that field.</p> <p>9 Q. And there were also wholesale net prices</p> <p>10 or wholesale acquisition costs also known as WAC?</p> <p>11 A. That's correct.</p> <p>12 MR. EDWARDS: That's W-A-C for the reporter.</p> <p>13 MR. KERN: Steve, let just interpose that --</p> <p>14 remind all the parties that the protective order</p> <p>15 does prohibit parties from asking about subject</p> <p>16 matter areas that were covered in prior depositions</p> <p>17 except as necessary to reasonably lay foundation,</p> <p>18 which I think you're doing.</p> <p>19 MR. EDWARDS: Which I'm trying to do.</p> <p>20 MR. KERN: Okay.</p> <p>21 BY MR. EDWARDS:</p> <p>22 Q. And as I understand it, you have</p> <p>23 testified about your work at First DataBank before;</p>

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